

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
ITA Informal Request for Certification to)	RM-10687
Coordinate Power Radio Service,)	
Railroad Radio Service, and Automobile)	
Emergency Radio Service Under Part 90)	
Of the Commission's Rules)	

COMMENTS OF CENTERPOINT ENERGY, INC.

Introduction

CenterPoint Energy, Inc. is a Houston, Texas based domestic energy delivery company with operations that include electricity transmission and distribution, natural gas distribution and sales, interstate pipelines and gathering operations, and more than 14,000 megawatts of power generation. The company delivers energy to nearly five million customers in Arkansas, Louisiana, Minnesota, Mississippi, Oklahoma, and Texas, and has natural gas-related operations in eight other states, Alabama, Illinois, Iowa, Kansas, Kentucky, Missouri, New Mexico, and Wisconsin. CenterPoint Energy, which has assets totaling more than \$19 billion, became the new holding company for the regulated operations of the former Reliant Energy, Incorporated, and assumed its new name, CenterPoint Energy, in September 2002 when the separation of Reliant Resources was completed. With more than 11,000 employees, CenterPoint Energy and its predecessor companies have been in business for more than 130 years.

CenterPoint Energy currently holds over 150 FCC licenses for frequencies ranging from 2 mhz to 23 ghz. These licenses and frequencies are critical to our ability to serve our customers, restore service during emergencies and continue to provide a safe work environment for our employees.

Comments

The supplying of electric and gas energy is vital to the Houston area economy and safety of the general public and requires sophisticated wireless communications. Every year the Houston area is subjected to various types of storms, be they hurricanes, tornadoes, floods, and occasionally even freak winter ice storms that cause massive power outages. It is during these times that CenterPoint Energy realizes the true value of our wireless communications and our allocated frequency spectrum. The restoration efforts involve hundreds of utility crews from CenterPoint Energy and our neighboring utilities that come to our aid. Although we have extensive radio communications systems, they are greatly overloaded during these emergencies, and our neighboring utilities bring in additional radio systems to supplement CenterPoint Energy's systems. Public systems such as cellular and paging are generally unavailable during the first several days of these emergencies. Primary communications to field crews is through our privately owned radio networks. Thousands of homes and businesses are usually without electricity and restoration of critical homes and businesses are dependent on our ability to dispatch crews using these private internal wireless systems.

It is obvious that any interference from close space co-users on our frequency spectrum allocations would cause complete chaos and potentially result in delays in getting electricity to the general public, and endanger the safety of the restoration crews. It is crucial to public safety that power be restored expeditiously during these types of emergencies. Critical dispatch communications for grounding and power line energizing relies solely on our ability to communicate in an interference free environment. There is little room for error. Radio communication between and among personnel engaged in live high voltage transmission work cannot tolerate co-channel or adjacent-channel interference. Any interference will cause unnecessary delays in transmitting field orders. Utility communications must be clear and concise to insure the safety of our employees and the public.

In the few months of competitive frequency coordination on shared utility frequencies interference has been apparent in several area of the country during emergencies, and has already diluted the importance of this utility spectrum. Business channels have become increasingly congested and while this can be construed as nuisance interference to those users, it is harmful interference when this type of congestion occurs on our frequency allocations. There is no way of predicting when channel priority should take place in a shared system. At any given moment, utility crews may need positive and clear communications, free from interference from other users. During any power outage there is suddenly a real danger to the general public and our crews. This type of emergency requires immediate response and concise dispatch orders. There can be no waiting until the channel is clear of routine non-utility communications.

ITA's request offers no understanding of the facts of Critical Infrastructure for utilities, but dismisses all private land mobile systems as basically identical. UTC was one of the

original FCC-certified coordinators, specifically responsible for the former Power Radio Service due to its representation of these industries; however, prior to the FCC's certification proceeding, UTC had been coordinating electrical, gas and water utility communications systems for decades.

Conclusion

In conclusion, CenterPoint Energy, Inc. urges the Commission to dismiss the informal request. UTC should remain the exclusive coordinator for Power Radio Service applicants.

Respectfully submitted,

CENTERPOINT ENERGY, INC.

By: _____

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